

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**[PROPOSED] ORDER ON OMNIBUS  
SEALING STIPULATION  
REGARDING DKT. NO. 2180**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), and after consideration of the moving papers, supporting declaration, the arguments of counsel, and all other matters presented to the Court, the Court rules that good cause exists to seal portions of the Parties' Joint Letter Brief on Whether Plaintiffs are Entitled to Additional Written Discovery, Document Productions, and a Deposition regarding Eugenia Cooney. (ECF No. 2179; ECF No. 2181 (corrected)).

Dkt. No.	Description	Requested Action	Language to Be Redacted	Basis for Sealing
2180-1	Joint Letter Brief	Sealed	Page 4, third paragraph, lines 4, 5 redact the words	Granted _____

			after “reported” to “by”, and the words after “external” to “partners”	Denied _____
2180-1	Joint Letter Brief	Sealed	Page 5, first paragraph, lines 6-8, redact everything after “TikTok feared” to “Further,”	Granted _____  Denied _____

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Peter H. Kang  
United States District Judge

1 Dated: September 12, 2025

Respectfully submitted,

2 **KING & SPALDING LLP**

3 By: /s/ Geoffrey M. Drake

4 Geoffrey M. Drake, *pro hac vice*  
5 TaCara D. Harris, *pro hac vice*  
6 KING & SPALDING LLP  
7 1180 Peachtree Street, NE, Suite 1600  
8 ATLANTA, GA 30309  
9 T: (404) 572-4600  
10 gdrake@kslaw.com  
11 tharris@kslaw.com

12 David P. Mattern, *pro hac vice*  
13 KING & SPALDING LLP  
14 1700 Pennsylvania Avenue, NW  
15 Suite 900  
16 WASHINGTON, DC 20006  
17 T: (202) 737-0500  
18 dmattern@kslaw.com

19 Bailey J. Langner (SBN 30753)  
20 KING & SPALDING LLP  
21 50 California Street, Suite 3300  
22 San Francisco, CA 94111  
23 T: (415) 318-1200  
24 blangner@kslaw.com

25 *Attorneys for Defendants*

26 *TikTok Inc., ByteDance Inc., TikTok Ltd.,*  
27 *ByteDance Ltd., and TikTok LLC*

28 By: /s/ Michael M. Weinkowitz

MICHAEL M. WEINKOWITZ  
LEVIN SEDRAN & BERMAN, LLP  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106  
T: 215-592-1500  
mweinkowitz@lfsbalw.com

LEXI J. HAZAM  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
T: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004

1 T: 202-386-9610  
2 pwarren@motleyrice.com

3 ANDREA MURA  
4 GIBBS MURA, LLP  
5 1111 Broadway, Suite 2100  
6 Oakland, CA 94607  
7 T: 510-350-9717  
8 amm@classlawgroup.com

9 FELICIA J. CRAICK  
10 KELLER ROHRBACK L.L.P  
11 1201 Third Avenue, Suite 3400  
12 Seattle, WA 98101  
13 fcraick@kellerrohrback.com

14 *Attorneys for Plaintiffs*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 12, 2025

/s/ Geoffrey M. Drake  
GEOFFREY M. DRAKE